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## LATHAM & WATKINS LLP

April 5, 2021

### VIA ECF

Hon. Kimba M. Wood  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Anne de Lacour et al. v. Colgate-Palmolive Co., et al.*, Case No. 16-cv-08364 (KMW)

Dear Judge Wood,

### MEMO ENDORSED

I write on behalf of Defendants Colgate-Palmolive Co. and Tom's of Maine, Inc. (collectively, "Defendants") in the above-referenced action. Defendants respectfully request to file under seal certain portions of the declaration of JoAnne Murphy.

Granted.  
KMW

Defendants believe that the request to seal is justified, as the Declaration contains proprietary business information regarding Defendants' marketing plans, development information, and distribution. Courts within the Second Circuit routinely allow for the sealing of such information. See, e.g., Grayson v. Gen Elec. Co., 2017 WL 923907, at \*1 (D. Conn. 2017) (nothing that "[d]ocuments falling into categories commonly sealed are those containing trade secrets, confidential research and development information, marketing plans, revenue information, pricing information, and the like[]").

In accordance with Rule 5(B) of the Court's individual Rules, Defendants will (a) publicly file the Declaration of JoAnne Murphy with the proposed redactions and (b) file under seal a copy of the unredacted Declaration with the proposed redactions highlighted via the ECF System.

Thank you for your consideration.

### SO ORDERED.

Dated: New York, New York

4/9/21

/s/ Kimba M. Wood

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Kimba M. Wood  
United States District Judge

LATHAM & WATKINS LLP

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ David K. Callahan  
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cc: All Counsel of Record via ECF